

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MICALDEN INVESTMENTS S.A.

Plaintiff,

- against -

**OLGA ROSTROPOVICH, COOLEY GODWARD
KRONISH LLP, RENEE SCHWARTZ, ATOOSA P.
MAMDANI, and MAHMOUD A. MAMDANI,**

Defendants.

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Case No. 07 CV 2395 (VM)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law dated May 31, 2007, and the Transmittal Affidavit of David Parker sworn to on May 31, 2007, and the annexed exhibits, defendants Cooley Godward Kronish LLP and Renee Schwartz will move this Court before the Honorable Victor Marrero, in Courtroom 20B of the United States Courthouse, 500 Pearl Street, New York, New York, for an order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the complaint filed by plaintiff Micalden Investments S.A. ("Micalden"), including each and every cause of action therein, together with such other and further relief as the Court deems just and proper.

Pursuant to Rule II(D) of the Individual Practices of the Honorable Victor Marrero and Local Civil Rule 6.1, any answering affidavits and memoranda by Micalden shall be served upon the undersigned within ten business days after service of this motion to dismiss.

Dated: New York, New York
May 31, 2007

KLEINBERG, KAPLAN, WOLFF & COHEN, P.C.

By: 

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